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Attorneys for Defendants
Verizon New Jersey Inc. and
Verizon Enterprise Solutions LLC (formerly known and improperly pled as NYNEX Long
Distance Company d/b/a Verizon Enterprise Solutions)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PROFESSOR ARNO MAYER, Verizon
customer, and all other similarly situated

Plaintiff,

v.

VERIZON NEW JERSEY INC., formerly
known as Bell Atlantic-New Jersey, Inc.,
NYNEX LONG DISTANCE COMPANY
d/b/a Verizon Enterprise Solutions, and
JANE and JOHN DOES 1-10, individually
and as owners, officers, directors,
shareholders, founders, managers, agents,
servants, employees, representatives and/or
independent contractors of VERIZON NEW
JERSEY, INC., and XYZ CORPORATIONS
1-10,

Defendants.

Civil Action No. 13-CV-03980-FSH-MAH

DECLARATION OF TELLY TORSIELLO

Telly Torsiello, being of full age, certifies as follows:

1. I am a consultant to defendant Verizon New Jersey Inc. ("Verizon"), located in Newark, New Jersey. I submit this declaration in support of Verizon's opposition to Plaintiff's motion to remand. Based on my personal knowledge and on my review of Verizon's business

records, I am familiar with the facts set forth in this declaration and can testify to these facts under oath.

2. Verizon collects and maintains the following billing information for its customers:

- a. Name;
- b. Telephone number;
- c. E-mail address (when provided by the customer);
- d. Address of the location where the services will be provided; and
- e. Billing address, if that address is different from the address of the location where the services will be provided.

3. Additionally, prior to processing an order for new customers, Verizon also conducts a credit check. Thus, Verizon requests that new customers provide their social security numbers and dates of birth to facilitate the credit check. A very small percentage of new customers decline the credit check process. In these rare circumstances, there are two options available to complete the order. First, the credit check system will generate several questions (e.g., which of the following three names have you used in the last five years), and the customer service representative will ask the customer to provide answers, which are verified by the credit check system. The answers to these questions are not maintained by Verizon. If that option is not available or the customer does not answer the questions correctly, Verizon will accept a copy of one of various acceptable forms of government-issued identification in lieu of completion of a successful credit check. Verizon maintains copies of such identification documents for thirty days.

4. Although Verizon collects and maintains addresses for the locations where customers' services are being provided and for where customers are being billed, Verizon does

not collect or maintain information regarding whether its customers reside at either of those addresses. Further, Verizon does not collect or maintain information regarding whether its customers intend to reside and remain at those addresses indefinitely.

I certify under penalty of perjury that the foregoing is true and correct.

A handwritten signature in cursive script, appearing to read "Tully Tonsillo", is written over a horizontal line.

Dated: December 12, 2013